

# Exhibit 6

DONG LI JANG \*\*HIGHLY CONFIDENTIAL\*\* 8/30/2018

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2 UNITED STATES DISTRICT COURT

3 WESTERN DISTRICT OF TEXAS

4 AUSTIN DIVISION

5 -----x

6 UMG RECORDINGS, INC., et al.,

7 Plaintiffs,

8 -against-

9 GRANDE COMMUNICATIONS NETWORKS LLC,

10 Defendant.

11 No.: 1:17-cv-00365-LY

12 -----x

13 919 Third Avenue  
14 New York, New York

15 August 30, 2018  
16 9:31 a.m.

17 Highly Confidential Videotaped  
18 Deposition of a Plaintiff, SONY MUSIC  
19 ENTERTAINMENT by DONG LI JANG, pursuant to  
20 Notice, before Christine DeRosa, a Notary  
21 Public of the State of New York.

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2 A P P E A R A N C E S:

3 STEIN MITCHELL CIPOLLONE BEATO & MISSNER LLP

4 Attorneys for Plaintiffs

5 901 15th Street, NW, Suite 700

6 Washington, DC 20005

7 BY: MICHAEL A. PETRINO, ESQ.

8

9 ARMSTRONG TEASDALE LLP

10 Attorneys for Defendant

11 7700 Forsyth Boulevard, Suite 1800

12 St. Louis, Missouri 63105

13 BY: ZACHARY C. HOWENSTINE, ESQ.

14

15

16 ALSO PRESENT:

17 JOE BARRION, Videographer

18 DAVID JACOBY, In-house counsel,

19 Sony Music Entertainment

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1  
2 an e-mail where someone else within the  
3 company was asking me, kind of similar to  
4 this, if I knew Rightscorp.

5 **Q. Because that person had been**  
6 **approached by Rightscorp?**

7 MR. PETRINO: Objection; form,  
8 foundation.

9 A. Yeah, I can't say for sure if  
10 they were approached, but, you know, possibly.

11 **Q. Separate from your discussions**  
12 **with Rightscorp, has your group internally**  
13 **discussed using Rightscorp to send notices on**  
14 **its behalf to ISPs?**

15 A. Other than during that, you know,  
16 initial period where we met with Rightscorp,  
17 I don't recall conversations in that regard.

18 **Q. Has Rightscorp provided any**  
19 **information to Sony about the functionality of**  
20 **its software, to your knowledge?**

21 A. Possibly in the initial meeting.  
22 You know, I can't say for certain, but  
23 possibly during that initial meeting, they may  
24 have discussed their service offering.

25 **Q. Do you recall any of those**

1

2 details?

3 A. I do not.

4 Q. Are you aware of any documents  
5 still existing within your group that  
6 Rightscorp may have provided to Sony about the  
7 operation of its software?

8 A. I'm not aware of any documents.  
9 Yeah, none come to mind unless it was provided  
10 in the discovery process, but none comes to  
11 mind.

12 Q. Is it fair to say, as we sit here  
13 today, you don't know anything about the  
14 technical details about how Rightscorp  
15 software functions?

16 MR. PETRINO: Objection; form.

17 A. The only extent in which I can  
18 describe their technology is what's described  
19 in the complaint. I don't have firsthand  
20 knowledge of their technology.

21 Q. To your knowledge, has Sony  
22 conducted any internal analyses or evaluations  
23 of how Rightscorp system functions?

24 A. I'm not aware of any efforts  
25 along those lines.